

**CLIFTON BUDD &**  
ATTORNEYS AT LAW

**APPLICATION GRANTED**

**SO ORDERED**

**VERNON S. BRODERICK**

**U.S.D.J.** 4/26/2023

Defendant shall respond to Plaintiff's complaint by May 10, 2023.

April 25, 2023

THE EMPIRE STATE BUILDING  
350 FIFTH AVENUE, 61ST FLOOR  
NEW YORK, NY 10118

**VIA ECF**

The Honorable Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Bose v. Young Adult Institute, Inc. d/b/a YAI*  
Case No. 1:23-cv-00496-VSB

Dear Judge Broderick:

This firm represents defendant Young Adult Institute, Inc. d/b/a YAI ("Defendant") in the above-referenced action. Pursuant to Section 1(G) of Your Honor's Individual Rules & Practices in Civil Cases, we write—with Plaintiff's consent—to respectfully request a two (2) week extension of time, from April 26, 2023, through and including May 10, 2023, for the Defendant to move, answer, or otherwise respond to the Complaint.

After the parties produced information in response to Your Honor's mediation referral order, discussions occurred concerning the facts and circumstances alleged in the Complaint. The parties are attempting to see if a motion to dismiss can be avoided. The reason for this extension is that the undersigned has been ill for the past 7-10 days and has been out of the office. The details have been purposefully left out of this letter, but if a conference is needed to provide more information to the Court off the public record, the undersigned will be available at the Court's convenience.

This is the third request for an extension of time to move, answer, or otherwise respond to the Complaint. There are no other deadlines in this matter that would be affected by the requested extension.

We thank the Court for its consideration of this request.

Respectfully submitted,

CLIFTON BUDD & DEMARIA, LLP  
*Attorneys for Defendant*

By: Ian-Paul A. Poulos

**VIA ECF**

LEE LITIGATION GROUP  
*Attorneys for the Plaintiff*